

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

VOLTERRA SEMICONDUCTOR	)	
LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 19-2240-CFC-SRF
	)	
MONOLITHIC POWER SYSTEMS,	)	
INC.,	)	
	)	
Defendant.	)	

**DEFENDANT MONOLITHIC POWER SYSTEMS, INC.’S  
MOTION TO EXCLUDE THE TESTIMONY AND OPINIONS OF  
PLAINTIFF’S DAMAGES EXPERT, DEFOREST MCDUFF, PH.D.**

Pursuant to Federal Rules of Evidence 702 and 703, defendant Monolithic Power Systems, Inc. (“MPS”) respectfully moves to preclude Plaintiff’s damages expert, Deforest McDuff, Ph.D, from testifying and opining on damages related to all reasonable royalty calculations based on an unreliable royalty base determination, an unreliable technology apportionment factor and/or an incomparable license. The grounds for this motion are set forth in MPS’s opening brief, filed herewith. Pursuant to D. Del. LR 7.1.1, counsel certifies that reasonable efforts have been made to reach agreement on the subject of this motion.

WHEREFORE, MPS respectfully requests that the Court grant this motion and enter the attached proposed order.

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